



Montana Department of
ENVIRONMENTAL QUALITY

1263462 - R8 SDMS

Judy H. Martz, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.state.mt.us

ENVIRONMENTAL
PROTECTION AGENCY

JAN 14 2003

MONTANA OFFICE

January 13, 2003

Mr. James C. Harris, P.E.
U.S. EPA Region VIII, Montana Office
10 West 15th Street, Suite 3200
Helena, MT 59626-0096

**RE: TECHNICAL IMPRACTICABILITY EVALUATION FOR GROUNDWATER
RESTORATION, FORMER SOMERS TIE TREATING PLANT, SOMERS,
MONTANA, November 27, 2002**

Dear Mr. Harris:

The Montana Department of Environmental Quality (DEQ) has reviewed the revisions to the Technical Impracticability Evaluation for Groundwater Restoration for the Former Somers Tie Treating Plant in Somers, Montana. Final comments regarding this revised document are attached.

Please call me if you have any questions regarding these comments.

Sincerely,

Lisa M. DeWitt

Cc: Brad Smith, DEQ Legal



491094

***Technical Impracticability Evaluation for Groundwater Restoration, Former Somers
Tie Treating Plant, November 27, 2002
DEQ Comments***

Page 5-3. Section 5.2. Areal Extent of the Technical Impracticability Waiver. Additional text needs to be included in this section to explain 1) why there are two spatially distinct areas defined for the areal extent for the technical impracticability waiver, and 2) why the proposed extent of the technical impracticability waiver is not the same as that proposed for the Controlled Groundwater Area. The following text is proposed for insertion between paragraph 1 and paragraph 2 of Section 5.2:

Two spatially distinct areas are shown in Figure 5-1 for the technical impracticability waiver due to exceedences of different contaminants. The smaller area has been established because samples from this well have exceeded the standard for zinc. The larger area is defined by exceedences of PAHs. Monitoring wells between the two areas do not exceed any remediation levels specified in the ROD, thus justifying the delineation of the two spatially distinct areas shown in Figure 5-1.

The area delineated for the proposed Controlled Groundwater Area (Figure 6-1) is larger than that proposed for the technical impracticability waiver (Figure 5-1). The proposed Controlled Groundwater Area describes that area in which the drilling of wells for any purpose other than remedial activities is prohibited. Groundwater withdrawals within the alluvial aquifer underlying the proposed Controlled Groundwater Area may cause contaminant migration. The purpose of the Controlled Groundwater Area is to prevent ingestion of groundwater exceeding drinking water standards for polycyclic aromatic hydrocarbon (PAH) compounds and zinc, and to prevent uncontrolled drilling of wells that could potentially cause exposure to and/or migration of the contaminants of concern. The purpose of the Technical Impracticability Evaluation is to establish that area in which it is not deemed possible to achieve the groundwater ARARs set in the ROD.

Editorial Comments:

Globally: Numbers with scientific notation did not print correctly. A global check of the text is needed to correct this throughout the document. DEQ noted this problem specifically on pages 2-14, 2-22, 2-23, and 2-24.

Page 2-17. Second paragraph of Section 2.4.2. Sentence 4. "The areal extent of the excavation in the swamp pond was 42,750 ft² the top ten feet of swamp pond soil contained an average...". This appears to be a run-on. Correct the sentence to read "The areal extent of the excavation in the swamp pond was 42,750 sq. ft. The top ten feet of swamp pond soil contained an average...".

Page 2-19. Section 2.4.5. Summary of Contaminant Sources. Paragraph 1. Sentence 2. "...estimates range between 5percent and 10percent of the pore spaces..." Insert a space between "5" and "percent" and between "10" and "percent".

Page 2-20. Section 2.4.5. Summary of Contaminant Sources. Paragraph 1. Sentence 6. Replace the word "impracticable" with "feasible".

Page 2-22. Section 2.5.3. Exposure Assessment. Paragraph 5. Sentence 2. Replace "S□85-5b" with "S-85-5b".

Page 4-4. Section 4.3. Alternative 2. Paragraph 1. Sentence 4. "...by a factor of 40 (i.e., 20 PVs , .05 PVs)." I believe that something is missing in the parenthetical. Please correct.

Page 4-6. Section 4.3.1. Description. Paragraph 1. Last sentence. Revise the last sentence to read "...LTU; LTU soil remediation goals have been met and the LTU was closed in 2002."

Page 4-7. Section 4.3.2. Description. Paragraph 1. "...by a factor of 40 (i.e., 20 PV , 0.53 PV)." I believe that something is missing in the parenthetical. Please correct.